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February 11, 2021

BY ECF

Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

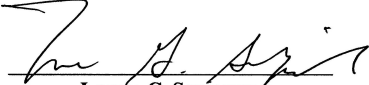
The application is GRANTED. The initial conference on February 18, 2021, at 10:30 A.M. is hereby adjourned to **March 18, 2021, at 10:30 A.M.** The materials for the conference, as outlined in the Order at Dkt. No. 3, shall be filed by **March 11, 2021**. The parties shall call (888) 363-4749 and use Access Code 558-3333. The time of the conference is approximate, but the parties shall be ready to proceed at that time.

SO ORDERED.

Dated: February 12, 2021

New York, New York

Re: Latif v. City of New York, et al.
Docket No. 20 CV 8248 (LGS)(JLC)


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, recently assigned to represent Defendants City of New York and the New York City Department for the Aging (“DFTA”) (collectively “City Defendants”) in the above-referenced action. The City Defendants request an adjournment of the conference scheduled in this action on February 18, 2021 at 10:30 am and the deadline for submission of the status letter outlined in Your Honor’s January 5, 2021 Order setting the date for the aforementioned conference. See ECF Dkt. No. 3. Plaintiff’s counsel consents to this request.

As noted above, the undersigned was just recently assigned to this case. My Notice of Appearance was filed today, February 11, 2021. See ECF Dkt. No. 13. As such, I was unaware of the conference scheduled for February 18, 2021 at 10:30 am and the required status letter due seven days before that conference as outlined in the January 5, 2021 Order. My Office was not informed of the January 5, 2021 Order by Plaintiff’s counsel as was required pursuant to that Order. See ECF Dkt. No. 3, at 2 (stating that “**Counsel who have noticed an appearance as of the issuance of this order are directed (i) to notify all other parties’ attorneys in this action by serving upon each of them a copy of this order and the Court’s Individual Rules forthwith, and (ii) to file proof of such notice with the Court.**”) (emphasis in original).

Given the foregoing, the parties have not been able to engage in the discussions necessary to provide Your Honor with the responses to the topics required to be addressed in the joint letter. Moreover, Defendants intend to file a Related Case Statement in this action, given its significant relationship to an action currently pending in this Court, Toussaint v. City of New York, et al. 19 CV 1239 (AT)(DF). In particular, both the Plaintiff in the instant action and the Plaintiff in Toussaint work in Information Technology Unit of DFTA, under the same

supervisory structure. Both Plaintiffs contend that they were not promoted on the basis of their shared race (African-American) and advance the same federal and state claims against the same Defendants. Additionally, both Plaintiffs are represented by the same counsel, Mr. Zachary Gaynor. In fact, the Second Amended Complaint in Toussaint and the complaint in Latif are largely identical, referencing allegations about both Ms. Latif and Mr. Toussaint.

Accordingly, Defendants request a 30 day adjournment of the February 18, 2021 conference to engage in the appropriate discussions with Plaintiff's counsel, as well as to permit this Court the time to consider Defendants' Relate Case Statement.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,
/s/ Dominique F. Saint-Fort
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